

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Sections 15.35 and 15.253 of)	ET Docket No. 11-90
the Commission's Rules Regarding Operation)	RM-11555
of Radar Systems in the 76-77 GHz Band.)	
)	
Amendment of Section 15.253 of the)	ET Docket No. 10-28
Commission's Rules to Permit Fixed)	
Use of Radar in the 76-77 GHZ Band.)	

REPLY COMMENTS OF XSIGHT SYSTEMS INC./LTD.

Xsight Systems Ltd. and Xsight Systems Inc. (collectively, "Xsight") submit these reply comments in support of the Federal Communications Commission's ("FCC") efforts to increase the utility of the 76-77 GHz band for the benefit of the public as described in the above-captioned proceedings. Xsight supports the views expressed by the various members of the automotive industry that the FCC should amend the Part 15 rules to accommodate their requests. At the same time, the FCC should make the necessary changes to allow Era Systems and other providers of airport safety systems to deploy fixed location radars in the 76-77 GHz band in airports (either on lamp posts like Era requested, collocated with runway/taxiway edge lights like Xsight requested, or otherwise), including installations near runways and taxiways. There is no need for the FCC to defer action on the Era request and, indeed, the public interest demands swift action on that request in order to permit companies like Xsight to deploy their potentially life-saving technologies at airports as soon as possible. The Federal Aviation Administration (FAA) has expressed the importance and relevance of such systems by

publishing an Advisory Circular describing automatic FOD detection systems. Various commentators from the automotive industry support approving installation of fixed radars in airports as well.

As noted in an ex parte letter filed with the FCC on January 13, 2011, Xsight specializes in electro-optical and radar sensing technologies for airports' safety applications.¹ Its flagship product is FODetect®, an innovative system that operates in the 76-77 GHz band to monitor civil and military airport travel surfaces (runways and taxiways) and detect Foreign Object Debris ("FOD"). FODetect has undergone a successful evaluation installation with the FAA and is ready for deployment in US airports and around the globe. Since Xsight's meeting with the FCC staff in January this year, Xsight has signed a major contract with the Israel Airports Authority to equip Tel-Aviv Ben-Gurion International Airport with FODetect. Execution is underway and the handover of the installation on the first runway in Ben-Gurion is scheduled for Q1/2012. Xsight has signed a contract with a prominent Asian airport to equip its two runways with FODetect by Q1/2012, and the project is well underway. With respect to the US market, Xsight has received the FAA's approval for compliance with the Buy American Act regulations and FAA standards for FOD detection systems. Xsight has signed strategic distribution agreements with three US companies: SAIC, THALES, and Honeywell.

Any misplaced item on airport property that has the potential to harm an aircraft is considered FOD. FOD has been a well-known challenge to the aviation industry for

¹ See *Ex Parte Letter of Xsight Systems Ltd.* filed in ET Docket No. 10-28 (Jan. 13, 2011).

many years. However, it was the catastrophic event of the Concorde crash at Charles De Gaulle in 2000—a crash caused by FOD on the runway and which claimed the lives of 113 people—that brought FOD to the attention of the general public. Fortunately, no such catastrophic accident has happened since, but aborted take-offs and other related safety risks are a daily occurrence. In addition, several studies published in the last few years have analyzed the costs of FOD damage to the aviation industry.² These estimates range from \$4 billion to \$12 billion of annual damage. Unlike ten years ago, today there are proven systems and technologies for automatic FOD detection that airports in the US and around the world are adopting to mitigate the risk of FOD.

The FAA understood the potential of the different available systems and technologies for assistance in enhancing public safety and cost saving to the industry and published an Advisory Circular ("AC") on airport FOD detection technologies in September 2009.³ AC 150/5220-24 was published after thorough research and field tests of the different available solutions, and following its publication, US airports can now use federal funding for the purchase of automatic FOD detection systems. These technologies offer real-time status notifications of runway status versus the current

² See, e.g., Insight SRI, *Runway Safety: FOD, Birds, and the Case for Automated Runway Scanning* (2010), available at, <http://www.runway-safety.com>; Insight SRI, *The Economic Cost of FOD to Airlines* (2008), available at <http://insightsri.com/system/files/The+Ecomonic+Cost+of+FOD+-+Jul08.pdf>; Brad Bachtel, *Foreign Object Debris and Damage Prevention*, AERO, available at http://www.boeing.com/commercial/aeromagazine/aero_01/textonly/s01txt.html.

³ See Federal Aviation Administration, *Airport Foreign Object Debris (FOD) Detection Equipment*, Advisory Circular No. 150/5220-24, Sep. 30, 2009, available at http://www.faa.gov/documentLibrary/media/Advisory_Circular/150_5220_24.pdf.

practice of several “manual” checks everyday of airports’ runways. With increasing traffic in US airports projected for the coming years,⁴ the FOD problem will potentially become worse. It is well in the interest of the traveling public to have the right means to make sure the nation’s runways are well-protected.

For all of the foregoing reasons, the FCC should allow providers of airport safety systems to deploy fixed location radars in the 76-77 GHz band in airports. The FAA and numerous industry groups have all recognized the threat that FOD poses to the safety of air travel. Allowing FOD detection systems to operate in the 76-77 GHz band will prevent fatal accidents caused by FOD and will substantially mitigate the \$4 billion - \$12 billion in damage attributable to FOD annually.

Respectfully submitted,

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⁴ See

http://www.faa.gov/about/office_org/headquarters_offices/apl/aviation_forecasts/aerospace_forecasts/2011-2031/media/2011%20Forecast%20Doc.pdf.